UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
vs.)	Case No. S1-4:20-CR-460 RWS
DEANDRE J. WHITE,)	
Defendant.)	

DEFENDANT DEANDRE J. WHITE'S FOURTH MOTION TO CONTINUE TRIAL

COMES NOW Defendant Deandre J. White ("Defendant"), by and through his attorney, James W. Schottel, Jr., and for his Fourth Motion to Continue Trial, and states to this Honorable Court as follows:

- 1. This case is set for trial on Monday, April 4, 2022.
- 2. The parties are finalizing the plea agreement so as the facts agreed to are true and correct.
- 3. Additionally and alternatively, hundreds of pages of documents and hours of video evidence were disclosed and, should this case go to trial, counsel needs additional time to review the documents disclosed and the elements of each count of the 11-count indictment.
- 4. Further, the undersigned needs additional time to discuss with Defendant, the proposed plea agreement, the evidence disclosed and the elements of each count of the indictment.
- 5. Counsel has discussed the substance of this motion with Mr. White and the relief requested herein.
- 6. Concurrently herewith Defendant Deandre J. White files his signed Waiver of Speedy Trial.

7. Defendant, through counsel, hereby respectfully requests a continuance of the trial setting in this case.

WHEREFORE, for the foregoing reasons, Defendant Deandre J. White respectfully requests this Honorable Court to grant his Fourth Motion to Continue Trial and for such other and further relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

SCHOTTEL & ASSOCIATES, P.C.

BY: s/James W. Schottel, Jr.

James W. Schottel, Jr. #51285MO 906 Olive St., PH St. Louis, MO 63101 (314) 421-0350 (314) 421-4060 facsimile jwsj@schotteljustice.com

Attorney for Defendant Deandre J. White

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022 the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

Catherine M. Hoag catherine.hoag@usdoj.gov

Attorney for Plaintiff United States of America

s/James W. Schottel, Jr.